

Reflect and Renew – A Review of the National Parks and Wildlife Service

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Foreword

Minister,

I submit herewith the *Reflect and Renew* phases of the Review of the NPWS. This work was largely conducted across the first two months of 2022, building upon the first phase of the Review, the Stout-Ó Cinnéide report.

While this analysis for the *Reflect and Renew* phases was undertaken largely via an organisational, governance and systems lens, it is clear that there are substantial convergences between the sets of recommendations across this and the Stout-Ó Cinnéide report.

The necessity for far reaching change of the NPWS is conclusive.

The substance of the recommendations here is based around a number of core principles such as clearer reporting lines, improved accountability, directorates structured along functional lines and resources directed toward key priorities. These should constitute a guiding reference for the changes through the months and years ahead.

These recommendations are not intended to be unduly prescriptive in their detail. Effective change management requires flexibility and responsiveness to the unplanned, alongside rigorous focus on progress. In practice, much will remain to be teased out by senior management and staff of the NPWS as the change programme progresses.

The challenge is to ensure that the crucially important organisational changes identified through the *Review, Reflect and Renew* process are realised. This requires political endorsement, extensive resourcing, and rigorous leadership by the new top management team within the NPWS.

My thanks for entrusting me to undertake this part of the review, to the NPWS staff and the Department for their generous engagement with me, and most especially Ms Ciara Carberry who travelled with me on this memorable journey. Her wisdom, talents, insights and extraordinary ability were truly remarkable.

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Introduction

The Review of the National Parks and Wildlife Service is a multi-phase undertaking.

These concluding phases follow from a consultation and report provided in the first 'Review' phase of the process by Professor Jane Stout, Chair, and Dr Micheál Ó Cinnéide, Deputy Chair.

The concluding phases of the Review are indebted to the Stout-Ó Cinnéide report for the wealth of its material, which forms the origin and sets the foundation for the *Reflect and Renew* phases of the Review of NPWS. That report drew upon more than 3000 contributions made to the authors on foot of extensive consultations across a wide span of external stakeholders and the general public, as well as the team within the NPWS. It authoritatively examines international comparators and sets out in clear and compelling terms the challenges and the struggles that the organisation is grappling with, and also the capacity gaps that are inhibiting it from addressing its mandate in full.

Given the short timeframe afforded to the *Reflect and Renew* phases, they have benefitted substantially from that report and this author is deeply appreciative of its depth of expertise, professional insight and knowledge. The author is also grateful to the Chair, Professor Jane Stout, for her personal engagement with me during this phase and for her insights which have helped to secure complementarity across these two phases.

As a key requirement to strengthen the NPWS and equip it for the future, the Stout-Ó Cinnéide report calls attention to the importance of reform of the internal structure of the organisation, while acknowledging that it does not propose a detailed, revised structure within its own recommendations.

A critical task for these concluding phases of the Review is therefore to address the appropriate organisational structures within the NPWS, alongside related topics of governance, resourcing, communications and data systems. Recent resourcing gains must be quantified in this context, and the changes that have occurred within NPWS in recent months must be reflected and integrated.

It follows that there are areas of conjunction and connectivity between matters addressed in the main phases of the Review. Where this happens, the review seeks to confirm such convergences as reflected in recommendations arising.

Consultations for these later phases of the process have largely focused on the knowledge, witness and experience of managers and staff within the NPWS. The Review is, therefore, significantly informed by and acknowledges the insights of NPWS personnel from across the regions and in Dublin. Deepest appreciation is due to these great public servants who gave so generously of their time and extensive knowledge to enable the concluding phases to be progressed and completed. Their engagement has been characterised by openness, idealism, passion, and a resilient determination, despite massive challenges, to do their very best for the State and the public which they serve.

Principal recommendations:

Governance

1. *Establish the NPWS as an executive agency within a Government department.*
...This secures a dedicated top management team, distinct mission statement, priorities and resources for the NPWS, while maintaining close direct reporting and accountability links to the Department, Minister and Government, and eliminating duplication by capitalising on efficiencies in terms of access to Departmental corporate service, expertise and supports.
2. *Change the NPWS internal structure, so that it is fit to meet current and future challenges*
...by establishing new directorates clustered around functional responsibilities. Five directorates are recommended: -
 - Conservation and Protection
 - Scientific Advice and Research
 - Parks and Reserves
 - Engagement, Corporate and Specialist Supports
 - Legislation, Licensing and Regulation
3. *Reconfigure the top management team within the restructured NPWS.*
... and assign this reconfigured team to develop, as an urgent and immediate priority, a dedicated organisational strategy statement and agreed core priorities for the organisation.
4. *Establish permanent standing committees, on a cross-functional basis across the new directorates, to address longstanding, multifaceted, complex matters*
These will be essential for managing crosscutting matters such as peatlands rehabilitation and restoration, biodiversity, habitat and species conservation, site designations, EU and international engagement, infringements and other legal cases.

People

5. *Fundamentally overhaul and improve HR capability and practice within NPWS.*
HR function for NPWS rest with a dedicated person. Recruitment to NPWS specialist and industrial roles should be overhauled and standardised; use of temporary contracts over long periods should end, and advertised roles should be graded correctly so that candidates within an appropriate band in terms of skillset and level of experience are encouraged to apply. Appropriate career structures should be developed for industrial staff.

6. *Set up an expert group, drawing on international expertise in organisations with a similar remit to the NPWS, to establish the human resourcing requirement of the NPWS on an international, best-practice basis.*

The expert group should report on its findings no later than three months after establishment, and make concrete, detailed recommendations for staffing levels across the five directorates, with a clear focus on ensuring that NPWS can deliver on its core functions and services to the public, now and into the future.

Legal

7. *Bring forward legislation to provide updated and stronger, statutory underpinnings for our National Parks and the work of the NPWS in protecting and conserving threatened and endangered animals, plants and habitats in the State.*
... This will clarify and underpin the powers of the Minister in relation to the operation and management of National Parks and nature reserves, and support key functions of the NPWS in nature protection and conservation.

Communications and ICT

8. *Overhaul and fundamentally transform the way NPWS communicates, both internally and externally*
External communications by NPWS should be professionalised, should prioritise a vigorous and timely engagement with social and other media, and a more open and collaborative engagement with civil society groups and others.
Internal communications should be timely, open and collaborative, professionally managed at a strategic level, and required as a basic competency in performance terms.
9. *Put in place a new, renewed and improved programme of Engagement, Awareness and Education by NPWS*
...as part of a wider strategy to present an authoritative, credible and compelling voice for nature in the State. This will help to develop community understanding and support for compliance and conservation measures for protected sites and species.
10. *Transform ICT*
The CIO Office in the Department of Housing Local Government and Heritage has brought forward a four staged process and pathway to transform ICT within NPWS and over the next three years. The review welcomes this development and recommends that immediate engagement on the proposal by senior management in NPWS so as to enable critical ICT reform to get underway.

Other recommendations...

- 11.** *Consider a wider examination of the remits of the broader constellation of State actors with significant responsibilities in relation to Biodiversity and Climate action.*
This would establish clarity as to where responsibilities lie; whether there is ambiguity, duplication or overlap, and most importantly where gaps exist that they are addressed coherently so that the State's response in relation to Biodiversity and Climate action can be delivered coherently and effectively.
- 12.** *NPWS should engage with other public bodies operating alongside it in the wider sector, to help ensure that each is playing its own part, according to its remit and responsibilities, and fulfilling its statutory responsibilities in relation to the protection of nature and biodiversity.*
NPWS senior management should critically review the large volume of work it undertakes on behalf of, or in response to applications/requests for input from other public bodies, so as to satisfy itself that the involvement, or nature of input being sought of NPWS is not inappropriate or unreasonable, having regard to those bodies' own responsibilities in these matters.
- 13.** *Create a number of new posts in NPWS immediately, additional to the filling of current vacancies, where these are needed to mitigate critical risks to the interests of the State*
Pending findings by the benchmarking group recommended at (6) above, an immediate injection of a minimal number of extra posts is recommended. This aims to mitigate unacceptable level of risks to the interests of the State in the short term; details of the recommended posts are set out at Chapter 5.
- 14.** *Conduct an assessment of the gradings of technical and regional posts by reference to comparable posts across the Irish public service*
Following on the findings of the benchmarking of the staffing of the NPWS by reference to international comparators, the grading of technical and regional posts should be assessed by reference to similar in the Irish public service.
- 15.** *Establish a new Engagement, Corporate and Specialist supports directorate*
This will create a resilient corporate spine for the NPWS which can efficiently interface with the Corporate function of the Department, thereby improving critical internal services in relation to HR, IT, Procurement etc, leading out on better engagement with external stakeholders, as well as equipping the NPWS of the future to cope better with departmental changes.

Chapter 1 - Scene setting

The National Parks and Wildlife Service (NPWS) while a relatively small structure, has an extraordinarily complex range of responsibilities:

- significant policy advisory and policy-making functions in relation to Nature and Biodiversity;
- a wide range of operational responsibilities including the management of six National Parks, 74 Nature Reserves, and a variety of other State lands accessible to the public;
- managing a range of EU programmes, alongside thousands of conservation measures across our designated areas and National Parks; it partners across a range of other conservation interventions;
- a broad scientific remit being the principal coordinator of the National Biodiversity Action Plans, the monitoring of designated sites, while undertaking significant scientific research;
- Being a statutory consultee in relation to planning matters, including county and regional development plans;
- regulatory and licencing functions;
- administering grant schemes to support farm-plans, conservation measures, actions for biodiversity, as well as invasive species control measures;
- investigation and prosecution of wildlife crime.

The structure is geographically diverse (32 office locations, across 19 counties), and given the breadth of its functions, draws on a wide range of specialised and professional competencies (there are 21 different professional and industrial grades) alongside expert managerial and policy-making skills.

For any proposed solution to the challenges faced by NPWS to be meaningful, it must take account of the diversity of its functions and the complexity of its interfaces.

NPWS is well served by teams of dedicated people across its various functions, be it industrial, regional, scientific, or administrative. Their collective capabilities constitute an exceptional resource in the service of the State and in custodianship of precious national resources and key responsibilities. But they have been buffeted by external challenges that are almost overwhelming whether in terms of biodiversity, climate change and international obligations, or indeed in meeting the demands and expectations of domestic stakeholders.

Internally, the challenges are even greater.

As set out in the Stout-Ó Cinnéide report and extensively articulated by NPWS personnel in the course of this review, the organisation is not fit for purpose and is not in a good position to deliver on its existing mandate.

The reasons for this are multi-layered and require a multi-layered response.

A critical reason is that over the past 25 years the NPWS has been moved across six Government Departments. This has left the structure without a stable overarching department to champion its resourcing, advance its structural evolution or bring a long-term, strategic focus to its activities. Instead it has been

routinely moved following changes of Government with significant upheaval and dislocation of ownership by departmental top managements combined with profoundly adverse impacts on its HR and corporate capability. Despite its impressive efforts to re-orientate and reconstitute itself repeatedly to fit with the different requirements and cultures of a procession of new parent organisations, the series of moves has resulted in a serious dislocation of focus from key areas such as resourcing, strategy and management of its environmental interfaces.

Another less obvious but damaging effect has been the unplanned visitation of additional workloads without resources onto the NPWS.

The initiative by Government in appointing a Minister of State for Heritage, someone who has worked tirelessly in the cause of the NPWS and led the organisation out of a prolonged era of under-resourcing to a point where it is back to pre-2008 levels of funding for the first time, means that it can be said, finally, that the political and administrative environment in which NPWS is operating has been transformed.

The review also wishes to acknowledge the resolute leadership at Assistant Secretary level by Mr Niall Ó Donnchú on behalf of NPWS. His commitment to tackling the difficult legacy of years if not decades of under-resourcing and departmental transfers, his determination to equip the NPWS on a scale that is neither incremental or timid and his ambition for the NPWS of the future, evidence exceptional leadership. This review could not proceed along its critical pathway without his steadfast support which has opened all NPWS doors (and even out-doors in the context of Covid) and enabled rigorous organisational scrutiny. The review acknowledges such leadership with deep appreciation.

For completeness it is also important to acknowledge the exceptional interventions and achievements by Corporate Division in the Department of Housing. These are set out in fuller detail at Chapter 2.

Recent developments, then, reflect both a ministerial and an administrative prioritisation to address legacy shortfalls in human and financial resources from the time of the economic crash.

However, the structural, strategic and resource challenges facing NPWS go beyond historic staffing shortfalls.

A single but significant indicator as to the difficult situation facing the NPWS is reflected in the escalation and development of potential EU infringement proceedings against Ireland for failure to meet its obligations under the Nature Directives. Comprehensive and attainable plans will be needed, detailing how Ireland is going to respond to its obligations, to avert the risk of court findings against Ireland in the coming years, with the potential for concomitant financial penalties.

Both the Stout-Ó Cinnéide report and this review seek, through different lenses, to assess and advise independently on addressing these critical challenges. As already indicated, given the time available, the review has sought to build upon the extensive research and consultations undertaken for that earlier report and draw from internal views within NPWS, alongside wider organisational knowledge.

Reflection - good organisational governance

Some fundamentals of good governance for an organisation include:

- It is fit for purpose in its basic status and design
- It has clarity of mission, vision and strategy
- Its internal structure/configuration appropriately addresses its mandate
- It has systems and practices in place which allocate tasks, specify outputs and promote accountability
- It features a strong leadership team which is cohesive, focused, agile and solution-oriented
- Managers and staff are clear as to their responsibilities and resourced to deliver on them
- It is competent and effective in the management of its interfaces with its external stakeholders
- It enjoys a strong corporate culture which is widely shared and promotes performance, teamwork and motivation.

Accordingly, this report has had broad regard to these fundamentals, both in the context of its consultations with NPWS personnel and its approach to setting out a framework for the way forward. But first an assessment of where NPWS has come from and recent significant gains.

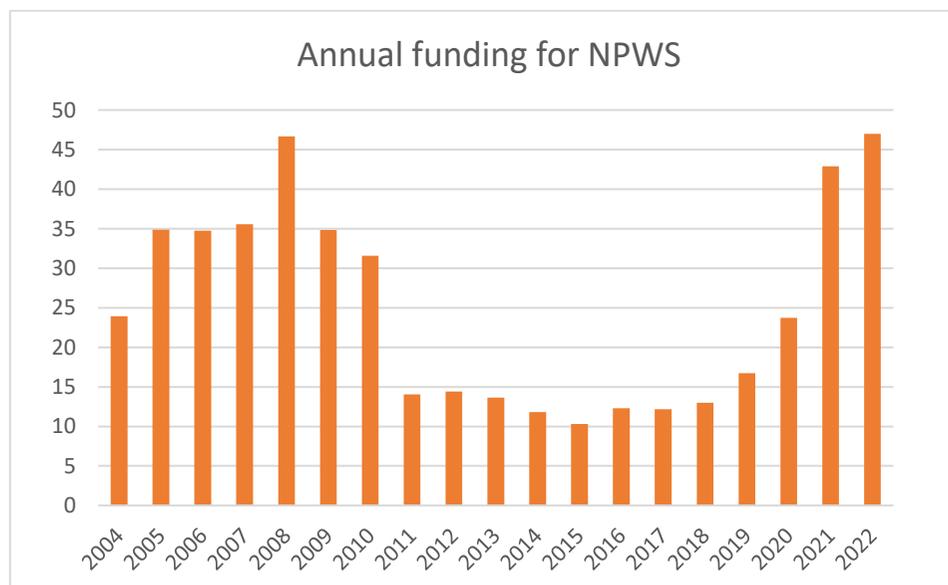
Chapter 2 – NPWS Historic losses and recent gains

Over the past decades, the scope and responsibilities of the National Parks and Wildlife Service have been continually increased, predominantly due to increasing obligations under EU law, a succession of adverse findings against Ireland by the European Court of Justice in this area, Government and public expectations, the impact of unprecedented development activity on biodiversity/natural heritage and a growing land management responsibility' (Grant Thornton, 2010).

The workload of the organisation has expanded greatly over the years, and even more so within the past decade. In fact, it is expected to increase further as the deadline for the 2030 goals for biodiversity, climate and sustainable development grows closer.

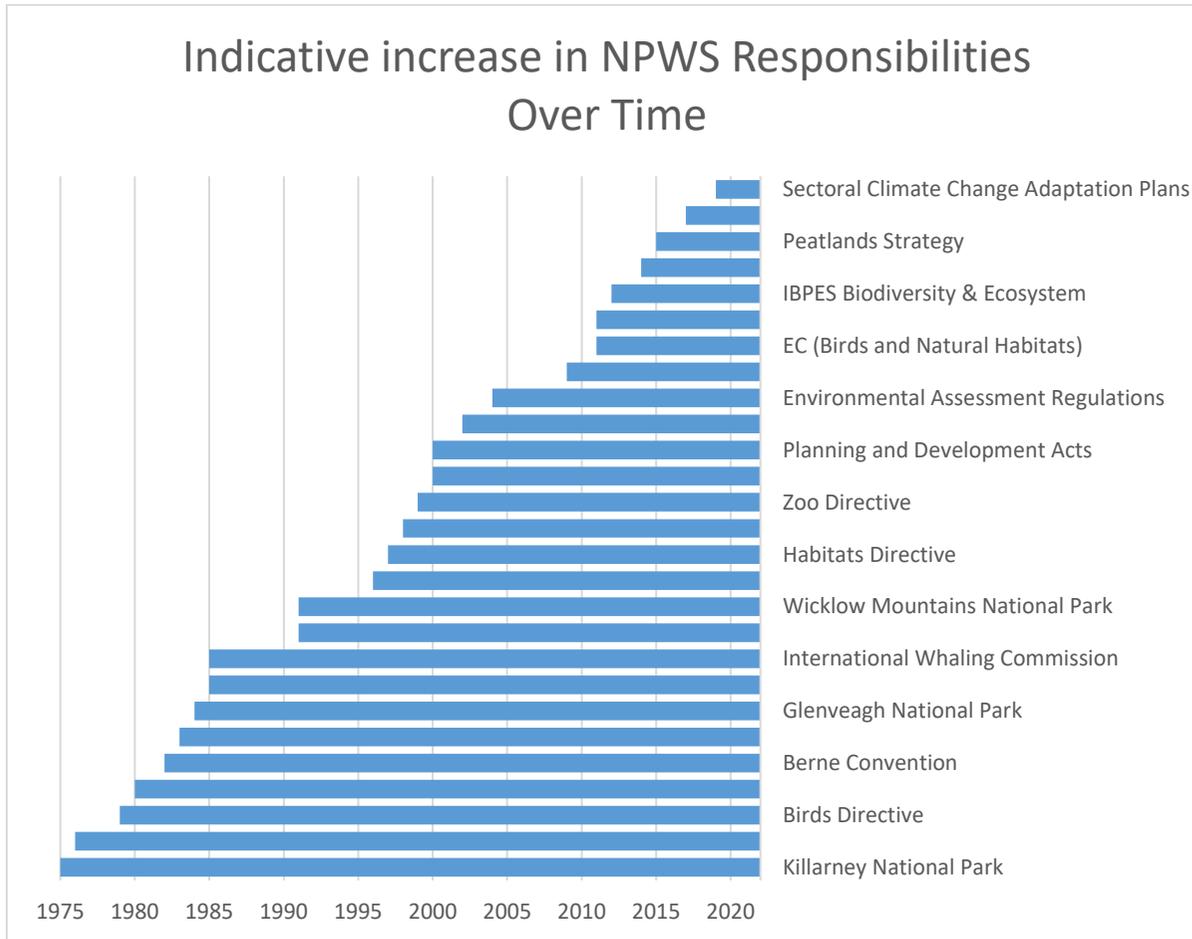
Despite this, the funding and staffing resources for the National Parks and Wildlife Service have consistently not kept pace with the scope of its responsibilities.

After the financial crisis the NPWS annual budget was reduced by 70%, falling from €46.665 million in 2008 to €14.034 million in 2011. This much lower budget allocation persisted, effectively unchanged, until 2020 when budgetary restoration gradually began, with funding only re-approaching 2008 levels as recently as 2021-2022.



Staffing has been similarly under-resourced over the years. NPWS staff numbers (including part-time staff but excluding temporary seasonal staff) were just above 300 in 2007, dipping below 300 after the financial crisis and not exceeding that number until 2017.

However, the 2010 Grant Thornton report on the NPWS recommended that the optimal number of NPWS staff was just under 400 full-time equivalent positions. Thus the recommended target of 400 FTE staff was not only never met, it was set to address only the needs that were evident in 2010: the sharp increase in responsibilities since then has increased the organisation's staffing needs.



In recent years staffing numbers have begun to recover and this has accelerated significantly in the period since the appointment of a Minister of State for Heritage. This appointment coincided with the most recent move to the current parent Department, and has been characterised by a striking level of engagement and support for NPWS capability by the corporate functions in that Department. The support of the Minister and the new Department is perhaps most clearly illustrated by a series of recent developments.

Internal analysis in 2021 identified the urgent need for an additional 87 posts across the NPWS to be filled in 2021 and 2022.

The full year's costs in 2022 for the 87 posts was estimated at €3.3m.

Of those 87 posts, 35 posts have now been filled and recruitment to a further 44 posts is underway, variously through internal competition, the Public Appointments Service or via Civil Service Mobility, and the remaining 8 posts are subsequently to be filled. Consideration of the multitude of competitions currently underway and planned to fill these existing posts illustrates in part how the current practice of conducting a myriad of micro-process for recruitment to specialist roles is creating an unduly onerous administrative burden, while not serving the needs of the organisation in terms of timely and efficient recruitment to key roles.

However, there is no doubt that the scale and commitment to improving the fortunes of the NPWS, as evidenced by the Corporate Division's sustained and determined efforts in this area mark a turning point and, as previously noted, when combined with unflinching political leadership and determined administrative commitment, have the potential to transform the organisation.

To put the recent developments in the wider context, however, it is a sobering reality that much of this improvement, while hugely welcome, constitutes a bare catch up to pre-2008 levels of staffing and resourcing, and the needs of the organisation to function beyond the bare minimum will demand adequate benchmarking against compatriot organisations in the international sphere as a reference and evidence-base to calibrate the required staffing resource in the longer term.

Chapter 3 - Consultation

The review has sought to meet with regional personnel, including industrial staff, as well as professional and general service grades based in HQ locations. The commitment and capability of managers and staff alike was exceptional. Their sense of loyalty to their work, their commitment to their work teams, to serving the public and to doing the very best for the NPWS are quite simply awesome.

Despite this, themes and concerns were raised time and again which left no doubt as to underlying organisational issues.

Common themes raised

- An absence of an integrated top management team, headed up by a senior figure dedicated solely to NPWS, alongside the lack of a cohesive mission, vision and strategy, has caused fragmentation and lack of shared priorities
- The absence of integrated business planning throughout and across divisions, despite it being in evidence in some areas
- A lack of clarity across the NPWS as to who owns what, who has lead responsibility on work areas and issues;
- A severe resourcing problem that has been aggravated by cutbacks necessitated by the economic crash, alongside a multitude of EU directives and obligations which have brought about major additional workload. In addition, domestic legislation had added significant extra responsibilities including providing for NPWS as a statutory consultee etc;
- A structural configuration which evolved over time and is not fit for purpose
- Internal communication that is seen as seriously deficient and external communications similarly
- Missing links and systems to address critical interdependencies between divisions.

In dialogue with the Principals heading up the current NPWS divisions their collegiality, strategic capabilities and openness to change were refreshing. Their eagerness for reform and willingness to work collectively as a leadership group was striking.

Poor alignment of the current divisions with the scale of the challenges facing NPWS and its complex functional needs were readily identified. Balancing functionalism, specialisms and geography was touched upon. So too was the need for a more homogeneous structure, within a Government department, but with its own head, senior team and mission. In this context the point was made that the frequent moving of the NPWS across departments has proved profoundly disruptive and taken considerable time, sometimes years to embed within a new department. The need for NPWS to engage more effectively with its external environment, (including civil society groups) was raised as a strategic issue to be addressed. A shared view among these senior managers and others was the desirability that NPWS remain within a Government Department, regardless of a new status or structure.

The need for primary legislation so as to provide a better statutory underpinning for the National Parks was identified, as well as the practicalities to addressed in securing such legislation. Vastly improved data capture and management was seen as an imperative against the backdrop of EU compliance

requirements and the need to radically improve recording and data sharing. In addition the need for robust procedures so as to provide consistency and transparency, better work integration across line managers, strengthened enforcement arrangements, were all identified as significant issues. The need to improve clarity on roles and responsibilities was emphasised. A lack of clarity of ownership and lead roles in some areas of work was seen as a particular challenge.

The issue of resourcing divisions to meet the scale of challenges facing NPWS was repeatedly touched upon.

In the context of dialogue with personnel across the regions there were two particular recurring themes

- the lack of the human resources to meet even the essential requirements of the job, and
- deficient communication systems and practices which left individuals and teams feeling disconnected and powerless

Regional staff and managers alike were clear as to the seriousness of the staffing shortages which appear all pervasive and have endured for years across divisions. This was aggravated by iterative requests and business cases for human resources that have frequently, according to managers in the regions, been neither been acknowledged or responded to. In addition they indicate, critical vacancies, including those at senior level have been left unfilled for years. On the communications front there was widespread sense, even among senior managers of little effective communication across NPWS. Compounding this, in some areas requests for the basics to do a job, such as a working photocopier, phones, internet access or livery have gone unaddressed. The lack of capital expenditure over the past decade on basics to do the outdoor job such as vehicles etc was also regularly raised.

The review was repeatedly advised that there was nowhere to go to appeal a HR or a material resource request which was refused or not responded to.

Life appears further complicated in the regions by a relentless volume of requests and consultations received by regional management from across divisions, the apparent unstructured reporting arrangements into three if not four Principals, and the absence in many areas of an appropriate level of support administrative staff. Arrangements affecting Industrial staff who are excluded from competing for confined competition to established posts was repeatedly raised. Similarly the lack of a career structure for Guides, along with the severity of the short term contracts over years, if not decades, or an awareness of the professionalisation of their ranks, featured also.

The review also met with groups of managers at AP level from across the HQ divisions, as well as analogous grades in the Science and Biodiversity Unit. The breadth of abilities, competencies and experience across these groupings as well as their incredible commitment to the NPWS was striking. Here again there was a commonality across issues raised.

Apart from resources, such issues concerned the apparent absence of an overarching strategy for the NPWS, a lack of clarity on roles and responsibilities, a fragmentation of functions across divisions, the historic absence of a senior leadership team to provide direction and address policy complexities, as well as issues with internal communications. Recurring problems in the filling of vacancies were raised as was the mismatch of gradings with the responsibilities of the job and the often significant qualifications and experience of candidates.

As an example of policy uncertainty, the issue of Biodiversity was mentioned and the lack of clarity as to the boundaries between NPWS and D/ Agriculture in this regard. It was strongly felt that priorities for the NPWS should be agreed by the top management team and then the business planning and activities of divisions should follow within this framework

The question of identity of the NPWS was repeatedly raised, particularly for those staff dealing directly with the public and the desirability of livery for this purpose. Significantly improved data management, including sharing of information, alongside better resourcing in the use and support of the GIS was raised. Clear ownership and leadership in respect of Engagement, Awareness and Education by NPWS was also identified.

The challenges of meeting EU requirements, not just in terms of Directives etc, but also in terms of resources to engage with, influence and secure funding was touched upon. The need for NPWS to more proactively shape and design the implementation of Directives was raised, as well as better planning overall rather than reactive responses.

Finally, the imperative for NPWS to achieve clarity as to its core business was repeatedly asserted, as was the need for improved systems of accountability within the structure.

Reflection

It is apparent, in light of the consultations reported above, and indeed wider external input reported in the Stout-Ó Cinnéide report, that there is a convergent set of views that NPWS as matters stand does not meet, or at least strongly exhibit, the essentials for good organisational governance.

Chapter 4 - Governance

Status

As set out in the Stout-Ó Cinnéide report a number of options present in relation to the future status of NPWS. Two in particular are prominent:

- NPWS to be established a standalone independent agency with a statutory remit similar to the EPA, Teagasc, Marine Institute etc;
- NPWS become an Executive Agency within a Government Department.

Other options contemplated were - maintaining things as they stand, or carving up the NPWS functions and dispersing them across other public bodies. Neither appear as positive choices. Current arrangements contribute to a lack of an overarching strategy, integrated leadership, and deeply unsatisfactory outcomes for the NPWS. Dispersal of NPWS functions would lead to a loss of a critical mass of expertise, fragmentation of resources, separation of knowledge from implementation, and a severing of science from practice across State properties. More fundamentally, such fragmentation would most likely further erode the State's capacity to address its legal obligations and, even more seriously, harm its ability to protect, maintain and restore precious natural resources.

Arguments by external stakeholders in favour of an independent agency include that it would "hold government to account for breaches of regulations/good practice". This appears to misunderstand the role of Government and of public bodies. In a democracy Government is accountable to parliament and to the electorate. Public bodies are mandated to deliver particular deliverables and accountable to Ministers of the Government. Not the other way round.

At a national level, there is a wide range of bodies and agencies already in place with functions in relation to Nature, Climate and the environment. The establishment of these long predate the current biodiversity and climate crisis. This review would strongly caution against creating or conferring new statutory mandates on NPWS or any similar organisation until such times as a strategic review of the remit and functions of existing agencies and organisations is undertaken. Such a review could critically assess the remit of existing bodies in this area, be they agencies or Government departments, identify shortfalls and overlaps arising and consider whether a reconfiguration of roles and leadership functions across such organisations is required. Only subsequent to such a review should consideration be given to creating or conferring a new statutory role for any other body.

It should also be noted that bodies such as the National Monuments Service share strong linkages and history with the NPWS. Any question of legislative status to the NPWS should require that the wider reconfiguration of such linked bodies be also considered.

The practicalities and challenges of establishing an independent agency are well set out in the Stout-Ó Cinnéide report which on balance in favour of an Executive Agency at this time.

An Executive Agency constitutes an organisation within a Department with its own mission statement, strategy, administrative head and management team. While having its own distinct identity, it draws on corporate and other supports from the main department and works within the Department's wider strategic framework. It is part of the Department's structure and reports to the Department's Management Board. It does not require legislation as it can be established on an administrative basis. Examples include the Probation Service, Met Éireann etc.

The Review supports the establishment of the NPWS as an Executive Agency within the departmental structure.

There are a number of strong arguments in support of this view.

In the first instance, the NPWS is no state to go anywhere. It needs rebuilding, resourcing and refocusing. The resourcing, restructuring, establishment of key strategic priorities and urgent harnessing of organisational capabilities is liable to be dissipated if not lost in preparations for transition to an agency.

Secondly, it is worthwhile to reflect on the critical and unique role of the NPWS. An requirement is that it provides an authoritative, impartial source of scientific and other advice, stands with competence over its decisions and actions and draws on its extensive experience in the management and conservation of our National Parks and Nature reserves, as well as managing these resources for the State.

Alongside the public its key ultimate stakeholder is Government.

NPWS needs to be in an ongoing relationship with Government so as to impartially advise, iteratively influence and actively support successive Cabinets throughout the coming decade and beyond against the backdrop of Climate change and the Biodiversity crisis. This a normative re-educative process with the apex of the political system. It requires sustained close and authoritative constructive engagement between NPWS and Government. Conversely, NPWS needs the confidence of Government so that it is resourced to do its job and also so as to secure the “soft” authority alongside its statutory mandate to engage most effectively and positively with its external clients.

A critical currency in all of this is Influence.

NPWS can best secure and exercise its Influence through its head being part of a Top Management Team of Government Department which works routinely and directly with a Minister who in turn is a member of Cabinet. In addition, the Directors within the NPWS, as part of the larger senior management team of a Government, can more readily influence, shape and indeed learn from being part of this wider network across all Government Departments.

This review is of the view that the foregoing presents a particularly strong argument in favour of the NPWS being established as an Executive Agency within the structure of a Government Department.

An Executive Agency

In the event of the recommendation on the establishment of the NPWS as an Executive Agency being accepted a number of consequential measures are essential:

- The appointment of a fulltime head at Assistant Secretary level so as to bring into a unified focus, generate collective effort, build team leadership and pursue vigorous change management; It is recommended that the existing A/Sec post which is already substantially devoted to NPWS responsibilities be deployed for this purpose.

- The articulation of the NPWS mission statement and strategy within the wider framework of the Department's Statement of Strategy, its objectives and the underlying strategies as to how to achieve these is essential not just so as to provide a shared clarity of purpose for all staff and managers across the structure, but also so as to identify priorities, and ensure resources and actions are appropriately addressed toward those priorities;
- The designation of the Head of the Science and Biodiversity function within NPWS as Chief Scientific Adviser on Nature and Biodiversity, so to as to recognise the critical importance, authority and impartiality of this role;
- The reconfiguration of divisional structures (see chapter 5 below) so as to build specialisms, clarify responsibilities and better meet the challenges of the NPWS external environment.

By being an executive agency, the NPWS can gain from ongoing access to Ministers and be best positioned to contribute to policy and access resources, while at the same time achieving better cohesion through its own Mission, Strategy Statement, Objectives and a dedicated top management team. That team can also collectively address a range of areas critical to corporate effectiveness including business planning, risk management, major cross cutting issues, external engagement strategies, budget allocations etc. Executive Agency status can also be hugely helpful in enabling NPWS to carve out its own identity more effectively and improve transparency in the discharge of its functions and responsibilities.

Culture comprises the beliefs, values and attitudes which guide behaviour of individuals and groups within organisations. It is apparent to the review that a variety of subcultures are present within NPWS. This is not surprising given the diversity of work, geography, absence of a strong corporate identity/top team, alongside communication issues touched upon earlier in this report.

A further area to be addressed by the top management team is the creation of a strong and positive corporate culture across the NPWS. The first step is to take stock of existing values and this might best be done by culture audit which would take stock of existing values and assess the extent of fragmentation/convergences of beliefs and practices. Arising from the information gleaned from such an audit the team can build towards a common set of shared values and purpose.

Given the scale of organisational change facing NPWS, this Review recommends that the position of its Head be filled by an experienced senior manager with a track record of leadership, change management, highly competent at political/administrative interface and the capacity for effective management of professional, technical and general service grades.

Conclusions

1. The move of NPWS to Executive agency can serve to progress a number of essentials in terms of:
 - Better fit for purpose in its basic status and design;
 - Clarity of mission, vision and strategy;
 - A leadership team which is cohesive, focused and solution-oriented.

2. A critical examination of the remits of State bodies who hold significant roles in relation to Biodiversity and Climate is warranted before any consideration of creating further statutory bodies in this space. This would serve to establish clarity as to where responsibilities lie; whether there is ambiguity, duplication or overlap, and most importantly where gaps exist that they're addressed so that the State's response in relation to Biodiversity and Climate action is addressed coherently and effectively.

Chapter 5 - People

Staffing

A recurring theme throughout consultations with internal stakeholders has been the issue of resources, and in particular a shortfall in human resources over a sustained period, making it difficult or impossible for NPWS to properly discharge its functions.

A brief review of staffing since the establishment of the NPWS in the early 1980s confirms the validity of this view. There is evidence of a significant drop in resources over the period, with a sharp reduction in staffing numbers in the context of the economic crash. The position in relation to the financial resources provided to NPWS over the same period also merits note. In tandem with the reduction in expenditure on staff, this same period saw a very sharp decline in capital resources, which are essential in an organisation such as NPWS for facilities, infrastructure, transport and acquisitions.

However, it is important to note that the past two years have seen a very significant and positive turnaround in the position regarding resourcing. NPWS funding has increased by *circa* 64% over this short period, bringing financial resources back to a level last seen in 2008. The funding secured in successive Estimates has enabled the Department of Housing, Local Government and Heritage to bring approved staffing at NPWS back to pre-2008 levels and to undertake a wide range of recruitment initiatives to fill these posts.

As noted previously these are significant developments which reflect positive political prioritisation of the NPWS.

However, there are a number of matters which argue strongly for a further increase in resources over and above recent provision. These concern:

- Ireland's obligations under the EU Nature Directives which require additional extensive resources to implement and which may result in infringement proceedings if not adequately addressed
- The new EU Biodiversity Strategy, and the National Biodiversity Action Plan which are to be co-ordinated by the NPWS at national level
- The extensive and growing regulatory and consultative obligations on NPWS which arise from domestic legislation, including forestry, foreshore and planning legislation
- The need to acquire, manage, protect and restore lands in the State critical for Nature and Biodiversity
- The constant and growing demand for expert ecological advice and commentary on Development applications and proposals across all areas of the country

Also, by reference to international benchmarks set out in the Stout-Ó Cinnéide report (4.3.5 and Appendix 4), it is apparent that NPWS remains substantially under resourced, notwithstanding recent gains.

In relation to EU Directives, as noted earlier Ireland is currently before the CJEU in respect of alleged failures to implement its obligations in respect of 423 of 604 designated sites of European significance.

In our National Parks, Nature Reserves, and indeed all State owned lands held by NPWS, (quite apart from its biodiversity and conservation/preservation responsibilities), the NPWS has major obligations in relation to the safety of visitors, management of tourism and protection of public assets. The scale of numbers visiting these properties has increased massively in recent years, and even more so, in the context of the Covid pandemic, which has effectively extended the summer season to all year round. This brings with it critical obligations and risks which must be effectively managed. The Parks, Nature Reserves and other State lands to which the public is accessing in unprecedented numbers are not equipped to manage these developments. Nor, managers advise, are they even broaching in many instances, their obligations in relation to conservation, protection and restoration either within the Parks or in the wider regions.

Alongside this, the volume of consultations/applications in relation to planning, works requiring consent etc. is frankly unmanageable under current arrangements; the Wildlife Crime Unit is not yet resourced fully to functionality, the Science & Biodiversity Unit has major and expanding responsibilities in relation to Biodiversity, the monitoring designated sites and listed habitats and species, EU and expert advice, licensing processes which require improvement – to mention but a few of NPWS areas of responsibility.

It is not within the gift of this review to comprehensively or critically assess the detail of the precise additional staffing requirement appropriate to enable the NPWS to fulfil its complex, diverse and mandates now and into the future.

Instead, the recommendation of the review is that this task should be undertaken by an expert group with international expertise and experience in nature conservation, the operation of national parks and a familiarity with relevant EU Directives.

NPWS has already established strong working relationships with similar organisations abroad. One option might be to secure the services of a senior official (serving or recently retired) from a respected body abroad, alongside similar from a jurisdiction with extensive familiarity of EU Directives and their implementation. The expert group should be established without delay and report its findings within three months of commencement. So as to best anchor this work realistically in the context of public administration in Ireland, the involvement of the Department of Housing, Local Government and Heritage and the Department of Public Expenditure and Reform in the group, alongside the NPWS, might be considered appropriate.

Notwithstanding the work of the expert group recommended above, and the expectation of early findings from its work, it is apparent that some interim injection of front line staff is essential at this time, over and above the posts currently being filled. This is required both to shore up against the mounting pile of litigation at EU and national level and to enable the NPWS to fulfil its basic legal national obligations – quite simply to keep the show on the road for now.

The review accordingly recommends the following extra posts at this time, as an interim measure pending the findings of the expert group referred to above:

- A Principal, AP, AO and CO to head up the new Engagement, Corporate and Specialist supports directorate and to lead out on the Change Management Programme required for the successful implementation of the changes in the Review
- One Grade 1 post in respect of Marine Habitats and Species in the Science & Biodiversity directorate to fill a critical deficiency in the current structure
- Two Ecologist Grade 2 posts in Legislation, Licensing & Statutory consultation directorate so as to secure appropriate priority to national projects
- Twelve additional regional staff, and one EO, to each of the Divisions, the regional staff comprising DCOs, Grade 111, Grade 11 and Grade 1
- One AP and one AO/HEO to urgently progress draft legislation relating to the national Parks as well as recasting Wildlife legislation

To be clear these posts are recommended as an immediate contingency, to address unacceptable levels of risk to the interests of the State, either in proximate or actual ECJ infringement proceedings, for the basic protection of its properties against third party encroachment, or the management of massively expanded activities in relation to visitors and tourism.

These are not proposed as an adequate resourcing response for the NPWS, or to fully meet the scale of current shortfalls or properly equip it into the future. Rather, those are matters ultimately to be addressed in the context of the international benchmarking of NPWS as proposed above.

HR practices within NPWS

Compounding its resourcing shortages, the NPWS carries with it a range of legacy HR practices that are not fit for purpose. A particular feature of these is a disposition to run competitions tailored to local or regional needs, rather than on a national basis, or to advertise multiple, dedicated competitions for overly narrow specialist or professional roles, rather than operating a single, national competition to create a series of panels with the necessary specialist or geographic subsets.

Another feature, based on narratives from managers, is the selection of candidates who are overqualified for the work or remuneration on offer. Greater reflection may be required at the outset as to the requirements of the job to be advertised, rather than the qualifications of the candidates who subsequently apply. However, this latter is more complex than it may appear on initial consideration. Managers across the regions and in other areas also report a mismatch between the grading of many posts, be they industrial, regional or scientific, with the level of duties required or commensurate qualifications. There is evidence to suggest that some applicants for professional and technical posts are over-qualified for the role advertised, and on selection may seek to negotiate for higher starting pay. This is not unique to NPWS and has been an issue for a number of years for many professional and technical competitions.

In relation to Industrial staff, and particularly Guides, the review noted a practice of providing 'seasonal' contracts for a number of months (usually eight or nine months at a time) to many such staff. Such contracts were offered time and again for years, sometimes close on decades, to individuals. The offers were frequently renewed at short notice and often caused delay in the provision of services at local NPWS visitor centres. These arrangements mean that services to the public in many areas are withdrawn or suspended for months of the year and critical engagement with schools (outside the run up to exams) does not

happen. The latter is hugely unhelpful to the wider NPWS role in building public awareness and support for conservation and preservation of our natural resources.

More generally recourse to these 'seasonal' contracts rolling over many years is neither desirable nor constructive. The review recommends therefore that the number of permanent posts be substantially increased, so that where appropriate services can be available to the public across the full calendar year.

In relation to Industrial grades generally the review came across instances where the gradings involved were did not appear consistent with the higher level skills of the jobs being undertaken. This was a matter also raised by specialist staff in other divisions.

The review was informed that Industrial staff, including Operatives, Storekeepers and Guides are not permitted to apply for confined competitions for promotion within NPWS, regardless of years of service, quality of performance, or range of competencies. This reflects central policy in respect of industrial posts across the Civil Service, however it means that such vacancies falling locally are inaccessible to staff and they are effectively left without a career structure.

The review recommends that the HR function within the Department of Housing, Local Government and Heritage engages with the Department of Public Expenditure and Reform with a view to the development of proper career pathways for these Industrial staff. In this context, consideration should be given to opening as many posts as possible which are currently run as confined competitions, to open competition, so as to attract the widest possible candidacy.

Conclusions

1. Extra staffing for the NPWS is urgently required at this time.
2. An independent assessment of the NPWS staffing requirements now and in the period ahead is also required. This should be led by the best of international expertise and good practice.
3. Significantly improved HR practices within NPWS are essential. This includes better planning for vacancies, embracing wider competitions with discrete sub-panels, and revisiting starting pay at a policy, not at a case level.
4. Careful consideration needs to be given to the level of qualifications or experience actually required for professional and technical roles, and candidates selected on that basis.
5. Widespread seasonal positions which are filled annually by short term contracts should be made into permanent posts
6. The development of career structures which respect, reward and motivate Industrial staff should be put in place
7. The grading of posts in specialist areas and across the regions should be separately reviewed by reference to comparable positions in the Irish public service.

It is apparent from the foregoing that the HR support within the NPWS needs to be significantly strengthened. In particular, there is a need for a HR resource who can manage HR processes and put in place documented and agreed procedures. This resource will be a link with Departmental HR, and would manage operational issues that are currently being directed into the Department, as well as providing focus, stability and corporate knowledge in this area to the NPWS for the future.

Chapter 6 – Structures - internal configuration of directorates

It is apparent from consultations with internal stakeholders, and indeed from a review of the distribution of functions and responsibilities across directorates, that the current structure of NPWS has largely evolved over time, frequently on an ad hoc, reactive basis. Reflecting this, uncertainties arise as to ownership of particular work areas, who has the lead roles on key issues and who bears ultimate responsibility for outcomes. The associated danger of disjointed location of work runs the risk that important work may not be afforded priority or appropriate resources in the directorate in which it lands.

As noted previously two essentials for good organisational governance concern:

- the appropriate alignment of internal structure/configuration to address the organisation's mandate, and
- having effective systems and practices in place which allocate tasks, specify outputs and promote accountability

In other words, the structure of the organisation should tend to direct resources and efforts toward its core priorities. A good organisational design helps direct the allocation of responsibilities and tasks, the measurement of outputs and the exercise of accountabilities, so that core priorities are achieved.

Accordingly an underlying principle which guides the recommendations of this review is to seek to cluster convergent work and responsibilities into a common area. In this way the opportunity for synergies, ownership of key areas and improved outcomes is maximised.

The review recommends NPWS should be restructured broadly on the following lines:

- A Parks and Reserves directorate dedicated to the operation and management of the National Parks, Nature Reserves and lands in the Minister's ownership to which the public has access;
- A Conservation and Protection directorate which integrates two existing directorates and brings teams of regional staff to more strongly prioritise this work across the State;
- A Scientific Advice and Research directorate with a renewed focus on its core priorities, led by a Chief Scientific Adviser on Nature and Biodiversity;
- A Licensing, Statutory Consultation and Legislation directorate which focuses on core work proper to NPWS;
- An Engagement, Corporate and Specialist Supports directorate which brings together cross-organisational functions currently dispersed across directorates, such as public engagement; GIS and Data Management; Legal services; Procurement and Finance as well as taking a leadership role locally which partners with central departmental corporate functions in HR, IT and Finance,. This directorate should also have a key role in Change Management for the NPWS.

Parks and Reserves directorate

For many members of the public our National Parks are a source of tremendous pride, an expression of our nationhood and a hugely valued public resource for recreation, enjoyment and adventure. More fundamentally, they should also constitute shining examples of achievement in conservation and biodiversity management, consistent with international criteria and the underlying mandate governing their establishment. They are home to numerous historic buildings and other structures from bridges, roads, walled gardens and tea rooms to visitor centres, bathroom facilities and boat sheds. They are staffed by teams who command respect and admiration by virtue of their expertise, vocational commitment and boundless energy to work in the service of the public good.

Paragraph 4.2.2 of the Stout-Ó Cinnéide report sets out extensive background on our National Parks as well as capturing their significant ecological, tourism and wider import. The running of each of these parks is hugely demanding, complex and involves an extraordinary range of duties and responsibilities and risks. This varies from conservation, protection and restoration of habitats, to disaster management and emergency response co-ordination; management of infrastructure, visitor management, liaison with commercial interests, processing of licences, culling of deer, and recording and reporting critical ecological data.

Under current arrangements, a single directorate entitled “Strategy, Regional Operations and Property Management” has responsibility for the Parks, the wider regions, conservation and property management, as well as NPWS finance and organisation functions all located together. This is an unmanageable portfolio. The result is that overburdened managers across this area are responsible for an endless myriad of fragmented tasks, apparently report to a range of senior officials and are diverted frequently from critical work as well as longer term strategic priorities.

A single directorate focusing solely on matters within the National Parks and State owned lands within NPWS jurisdiction, headed up at Principal level is required. This directorate’s remit should concern policy and planning for the Parks and Reserves, procedures and practices within, and their operational management.

Key critical deliverables of this directorate concern: an overarching strategic plan for our National Parks; a framework for planning for individual parks, as well as resourcing and measuring delivery alongside risk management.

Within this directorate, each National Park should have a fulltime Regional Manager, supported by a dedicated team comprising technical and Industrial staff and administrative support. The line-reporting relationship of Regional Manager in the park to a Divisional Manager should be retained. Where not already in place, a medium term strategic plan for each Park should be developed by the RM and his or her team, to a template agreed by DMs across the Parks directorate. Business planning aligned to resources should be developed for each park annually by the RM and his or her team to underpin the achievement of strategy. The strategic plans and business plans should be approved at Divisional Manager level before being submitted for consideration to the NPWS senior management team.

The Regional Manager for each Park should also have responsibility and resources to deliver on Conservation/Protection Measures within the Park as agreed annually in Business Plans and within the framework of priorities set by Conservation and Protection directorate.

The review further recommends that the current Finance and Organisation Unit move out of its current division and be located within the proposed new Engagement, Corporate and Specialist Supports directorate. The location of the Property Management Unit also falls for consideration and on balance the review tends towards locating this with the new Parks directorate, given this is the area to which the bulk of its work relates.

Conservation and Protection directorate

The scale of challenges arising in relation to nature and biodiversity is truly daunting and clearly set out in the Stout-Ó Cinnéide report. Key requirements, whether set by domestic legislation or EU Nature Directives, are not seen as being adequately met and Ireland's nature is suffering in line with global trends. The scale, frequency and the significance of legal challenges currently facing NPWS evidence that the structure is not viewed as delivering, or adequately delivering, on its mandatory obligations. Further requirements on foot of the Climate Act, alongside UN and EU strategies will greatly increase the demands and challenges facing the NPWS in relation to conservation, protection and restoration of nature.

It is essential therefore that the organisation is restructured in relation to its conservation and protection functions so as to better meet current and future challenges.

To this end the review recommends that a single Conservation and Protection directorate be established. The staffing structure of this directorate should be drawn in the first instance from the Peatlands Conservation & Restoration and the Conservation Measures directorates. This means the existing staffing of these areas comprising 2 PO posts, and their respective staffing cadre should transfer inwards but with a reallocation of functions on the lines of Conservation (practical measures, information, engagement, agreement, incentives etc) and Protection (including sanctions and enforcement). Regional teams on the ground, for areas outside of National Parks and Nature Reserves, should be substantially strengthened and report into this directorate through their Divisional Managers. Wildlife Crime Unit should be relocated here and resourced so as to enable it to function. Immediate challenges for this directorate concern prioritisation of measures to secure compliance with legal requirements in respect of Protected Areas, alongside priority habitat conservation and restoration programmes.

- The establishment of a comprehensive suite of Measures to meet statutory requirements arising from designations etc;
- Implementation plans to deliver on the programmes;
- Peatlands Conservation and Restoration;
- Management of regional teams to secure implementation of Measures across the regions in lands that are not State owned;
- Agreeing with Parks directorate on the annual delivery of parallel conservation measures within the National parks and Reserves;
- The putting in place of standardised procedures and recording processes on a shared data bases so as to readily evidence and demonstrate compliance.
- Enforcement and Wildlife Crime – provision of specialist input and lead to support local actions in the regions/Parks;
- Lead role/ownership of national and EU legal cases relating to conservation measures involving NPWS.

While Regional Manager roles can be reasonably accommodated within both the Parks and the Conservation and Protection directorates, this is not the case for the role of a Divisional Manager, which entails responsibilities both in the Parks and across the wider countryside. The Divisional Managers themselves cannot be expected to report in to multiple line-managers and therefore a reassessment of arrangements relating to Divisional Managers is appropriate. One option to be considered is to separate out roles for the DMs with some taking responsibility for the Parks and others taking responsibilities for activities across the wider region outside. This carries the benefits of clarity of roles and responsibilities for the DM, as well as reporting into a single directorate. Ultimately this is a matter to be settled upon by senior management in discussion with the Divisional Managers

Scientific Advice and Research directorate

Given the declared Biodiversity Emergency, it is clear that the NPWS must be equipped to play its part in the State's overarching efforts to address the twin priorities of both biodiversity and climate change. Indeed, as climate change and the challenges of reversing its damaging impacts deepen, the importance of authoritative robust scientific advice moves centre stage. This assumes a deepening significance for the Science and Biodiversity function not only across the NPWS but also for the Minister and for Government itself.

The review therefore recommends that the current Science and Biodiversity Unit should be reconstituted as a directorate and its head retitled as Chief Scientific Adviser on Nature and Biodiversity so as to reflect the critical importance of this function within NPWS and beyond.

A core function of this directorate will be to provide scientific evidence to NPWS, to inform conservation priorities and site designations and provide advice on conservation measures, alongside monitoring, surveying, research and the wide range of responsibilities directly relating to their professional disciplines, as clearly set out in the Stout-Ó Cinnéide report (4.4.2). Additional staffing sought relating to such core functions is supported. In particular the review endorses strengthening the directorate so that it can excel at delivering on its core remit of the provision of world class scientific advice across the NPWS and undertaking appropriate primary and applied research. It recommends that staffing within this directorate be included and reported on by the independent internationally led group proposed at Chapter 5 above.

However, the absence of even a single dedicated senior post in respect of Marine Habitats and Species presents an immediate and unacceptable risk. The review recommends therefore that a Grade 1 post be established at this time and filled as a priority.

The review noted a range of other functions currently reside in the current Science and Biodiversity Unit, including Biodiversity Awareness and Web Content Management, GIS and Data Management, etc. It recommends that this work should transfer out to the new Engagement, Corporate and Specialist Supports directorate. Biodiversity-related work proper to other agencies is also undertaken here, frequently driven by the commitment to fill gaps by other public bodies and ensure that there are no shortfalls. Given the major work pressures and high-priority core tasks facing the new Scientific Advice and Research directorate, consideration might be given as by the NPWS senior management team as to how best, both in the Licensing & Legislation division and here, to manage other public bodies expectations and practices so that they to more fully address their responsibilities in relation to nature and biodiversity.

Finally, the quality of linkages between this directorate and the regions needs strengthening, with clarity provided by the NPWS senior management team as to the supports to be provided, or alternatively, the priorities and outputs which should take precedence.

Licensing, Legislation and Statutory Consultation directorate

As currently constituted, this directorate comprises four main areas - Ecological Assessment Unit (EAU), Legislation and Guidance Unit, Development Applications and Wildlife Licensing Unit.

The review recommends that this division remain largely intact bar the transfer of Wildlife Crime Unit (to also include enforcement and prosecutions) to Conservation and Protection directorate.

It is noteworthy that the area has been subjected to tsunami of work arising from large volume of applications for advice, assessment and input from across other public bodies in relation to ecology. This current position is problematic and untenable.

The review is not convinced that all of this work, or much in its current format, from across public bodies, including local authorities, is appropriate to NPWS.

It recommends that senior management in NPWS mandate a critical assessment of the range of applications being received be undertaken, alongside other work it undertakes for public bodies. The assessment might include in its considerations:

- Whether NPWS is the correct public body to receive and substantively input across the range of types of applications it currently receives;
- If the former is the case, the extent to which other public bodies involved are fulfilling their own ecological responsibilities and evidencing accordingly prior to approaching NPWS.

In light of the findings of such an assessment, NPWS should initiate direct action with the public bodies concerned and rewrite the script, through legislative provision if necessary. The purpose of such an intervention is to better enable NPWS to provide focused, authoritative input on ecological matters proper to its own jurisdiction. And to ensure other public bodies own their lead responsibilities in relation to ecology.

The review noted that there is no provision of staff whatever for developing legislation urgently required in relation to reviewing and recasting the Wildlife Acts and the Birds and Habitats Regulations.

The review also noted the critical conjunction the EAU represents in relation to the progressing major national development projects, alongside the direct risks posed by current staffing levels. Pending the establishment of the internationally led group to look into staffing across NPWS, the review recommends the appointment of two additional ecologists at this time at Grade II level, to support the existing team and enable the deployment as required of experienced staff to proximate national development priorities.

To enable essential draft legislation to be prepared, the review also recommends that 1 AP and 1 AO be assigned for this purpose, additional to existing staffing levels.

The work being done by the Wildlife Licensing Unit is highly administrative. The review further recommends that the processes involved be reviewed as a priority with a view to modernising the processing of licences, utilising ICT solutions to streamline practices, potentially freeing up administrative resources that could be redeployed elsewhere.

Engagement, Corporate and Specialist Supports directorate

One of the principal reasons the NPWS has fared so badly through numerous transfers over the past number of decades, is the absence of a corporate spine which can hold together a repository of knowledge and understanding of the organisation in structural terms, and provide and preserve crucial knowledge and insights – a stabilising centre for the structure, so it can ‘hit the ground running’ in a new Department.

The benefits of such a directorate are manifold: it provides resilience in the form of a core of corporate knowledge that can survive an organisational move; it forms a ready-made resource to interface and partner seamlessly with the corporate functions in a new Departmental home; it can provide a locus for critical supports to the other directorates that are currently either absent or underdeveloped, most notably in relation to procurement, communications engagement and staffing; it can build areas of particular expertise in areas such as GIS, data management and property management, as well as driving the change agenda; and it can also confer the structure with a substantially improved capacity through a stronger HR and corporate capacity to absorb to manage any future changes of parent Government department. It can also promote planning, monitoring, and evaluation of performance across the directorates.

As noted earlier, legacy HR practices within the NPWS require significant overhaul, so as to deliver better outcomes. Similarly, the capacity of the HR/Organisation function within NPWS to take on a significantly more engaged role with directorates in planning for the filling of vacancies, in responding to business cases needs development and in advising on good practice by line managers is required. The need to work within, and avail of the expertise and support of the corporate functions of the main Department remains, but the management, filtering, prioritising of HR demands from directorates should be dealt with locally in this NPWS directorate, and a coherent, unified position communicated to the central function on behalf of the entire NPWS.

It is also apparent to the review that staff in the regions are frequently undertaking work which could benefit from access to expert guidance. This is particularly apparent in relation to procurement but needs also arise in relation, PR, as well as in respect of matters relating to architecture and legal issues etc.

The review therefore proposes the establishment of an Engagement, Corporate and Specialist Supports directorate. The functions such a directorate would comprise:

- Corporate planning and performance management
- Existing Finance, Organisation unit functions;
- HR functions
- Procurement
- Architectural & Engineering

- Communications, Engagement and Awareness
- Change Management

It is noted that NPWS already has in house architectural and legal expertise in place. It needs to add to this cadre with the other specialisms mentioned.

Similarly, public engagement and education are fundamental to building public awareness and support for nature conservation and biodiversity. This area does not stand on its own but is rather an integral part of an effective suite of initiatives to secure community ownership, acceptance and compliance with measures to protect and conserve our natural heritage. Viewed in this light, Education and engagement can be understood as a critical strategic element of NPWS mission. But at this time educational services are centred about ten centres in the National Parks and Nature Reserves, and largely limited to visitors to those sites. The NPWS needs a high level strategy, drawing on Departmental communications expertise, to address Education and Engagement - a strategy for engagement locally, nationally and internationally; establishing strategic alliances, running national awareness campaigns and also a leadership framework to guide and support the work of NPWS guides.

This directorate would also undertake a critical role in developing greater awareness across NPWS of the supports available from Corporate Division in the Department, and provide an important link to these services and supports.

Reflection

The review proposes a move towards greater specialisation of functions. It proposes a closer focus for directorates on core business, with a relocation of other functions to elsewhere within NPWS. It should also mean a strengthening of the NPWS's capacity to identify core priorities and develop coherent organisational policies, approved by the senior management team.

As was noted in discussions throughout this process with senior managers – there is no perfect internal organisational configuration. Only a model which seeks to better match internal structures with external mandates and obligations.

Given the sheer complexity and interdependencies across the work NPWS undertakes it is apparent that, in addition to these proposed directorates, permanent standing committees, on a cross-functional basis will also be required. These will be essential for managing matters which cut across directorates such as site designations, peatlands rehabilitation and restoration, biodiversity, conservation of habitats and species, EU and international engagement, infringement and other legal cases.

To be clear, the establishment and operation of cross directorate project teams, both short-term and longer-term, must be an organisational priority within NPWS. Only in this way can it maximise its capability to tackle the complexities of the issues it has to deal with and meet the challenges of its environment. To this end, arrangements to underpin cross functional teams need to be formalised and guidelines and principles for their operation put in place.

Alongside such arrangements, the review recommends that networks of managers across the country be established. Such networks, comprising technical, professional and administrative peers together should meet regularly to share information, develop better understanding of directorate challenges and learn from good practice. Such networks can also serve to build and strengthen corporate awareness and culture.

The Engagement, Corporate and Specialist Supports directorate, mandated by the top management team, would appear the appropriate place to lead on enabling these initiatives.

Conclusions

The review proposes five directorates with some significant relocation of work alongside the establishment of a new directorate. It also recommends the establishment of permanent standing committees to address complex cross cutting issues.

The review recommends that senior management in NPWS mandate a critical assessment of work undertaken on behalf of, and the range of applications being received from, other public bodies. The assessment might include in its consideration whether NPWS is the correct public body to undertake such work/receive and substantively input across the range of types of applications it currently receives.

Chapter 7 Communications and ICT

Communications

A recurring issue raised by staff and managers alike across the NPWS is the need to improve its capacity and performance in relation to communications, both internally and with the public and external stakeholders.

As matters stand NPWS is without its own resource to focus and develop its communications needs or outputs. This means that most of its external communications are led by the Department of Housing, Local Government and Heritage which has major other responsibilities. In practice this arrangement constitutes too great a distance from work on the ground in the regions, as well as the work within directorates.

Despite strong localised efforts in some areas, this appears to have led to a passivity across the NPWS in the collection and assembly of material for publication, or providing stories of insight and interest to the public, or systematically generating data of interest to specialist-interest stakeholder groups. This in turn feeds into a lack of transparency, a lowering of confidence in the structure and, inevitably an increase in FOIs, AIEs and similar requests. It is damaging to NPWS standing and at odds with a critical need to generate public awareness and support for its conservation and preservation measures. Or indeed public celebration of the remarkable achievements by the NPWS, or of the great natural treasures it holds.

Internally, managers and staff advise that deficient communications practices have left them frequently unaware of work underway in other areas of the NPWS, significant wins, or setbacks, or developments which may have direct impact on their own work. This can result in a sense of detachment, isolation and a pervasive lack of understanding of the overall purpose of the structure. It can also cause teams to be ill equipped to tackle projects on a fully informed basis, drawing on the best of wider organisational knowledge and experience. It can also be damaging to morale.

The review recommends that an experienced communications person be appointed to a post at AP level in the Engagement, Corporate and Specialist directorate, working with the wider team to lead out on Communications (both internal and external) in terms of strategy, practices, supports and outputs. This post is additional to current staffing and the holder would work closely with the Communications staff of the parent Department. The position would be supported too by executive support at each of the four regional centres, to bolster cross-regional connectivity. Priority outputs from this position should be determined in consultation with the NPWS senior management team. In addition, in relation to internal communications the collective of management across the NPWS should deepen its engagement with good practice in this area. Communications skills should also constitute a critical competency to be assessed when considering suitability for promotion.

ICT

Inevitably, the development of ICT has suffered significantly from the iterative moves of NPWS across the Departments. This has resulted in fragmented systems within the structure that are no longer fit for purpose, or are outdated and evidence poor data capture and deployment capabilities.

This has presented as serious process and practice issues across divisions.

Effective information management is critical at so many levels – to track progress in conservation and restoration, to evidence compliance with directives, to support scientific research and evaluation, to guide priorities and resources, to inform management decisions and to secure effective reporting and accountability. To demonstrate compliance at European level on protecting Ireland’s biodiversity in Natura sites NPWS needs to collate data from multiple sources and systems. Where much of the data exists it is very challenging to collate into a single repository to facilitate analysis and reporting. This problem has been caused by data being captured in systems that have been designed for a single solution or purpose - it did not address the need for wider data integration and reporting.

An impressive framework for the modernisation of ICT across the NPWS has very recently been developed by the CIO Office in the Department. This sets out a four staged process and proposes a pathway to transform ICT within NPWS and the wider Heritage group over the next three years. It also gives firm undertakings as to the supports and leadership available from that Office to advance the framework into reality.

It further undertakes that in the next 8 to 12 weeks ICT Operations personnel will visit all NPWS sites to identify and repair on site any issues that can be fixed at the first point of contact. The issues that cannot be fixed on site will be identified and tracked to completion through the ICT Business Plan 2022.

The review strongly welcomes this ICT plan and endorses an early engagement by the senior management team with its evaluation and advancement.

It also welcomes the immediate on the ground activity by ICT personnel at this time.

Chapter 8 - Next Steps

Change management

Following the conclusion of this review, and long after any interest from the public or the media has waned, the people that spend their working lives within the NPWS will be dealing with the challenges and the realities of delivering a profound organisational change.

For the renewal of the NPWS to succeed, those people will expect early, transparent and credible decision-making, authoritative and collaborative leadership from the senior team, and a clear road map ahead.

A huge level of communication – with staff, managers, Ministers and external stakeholders will be critically important, and the whole change programme needs to be led and overseen by a dedicated resource, at an appropriately senior level within the NPWS, who is accountable for driving and managing the change programme.

The Action Plan below sets out a broad framework for the delivery of such change. It assumes ongoing dialogue with staff by senior management in NPWS, and appropriate engagement with staff associations by HR in the Department of Housing in relation to the changes:

Key milestones for the renewal process:

- NPWS established as an Executive Agency
- Top management team in place and performing its collective functions
- Five new directorates within NPWS established along new functional lines
- Extra posts which are directly required approved and filled
- Expert group with international expertise convened to advise on current and future staffing requirements
- Findings of the expert group implemented
- Legislation drafted and brought forward in the Oireachtas